## PUT OF STREET

## U.S. Department of Justice

United States Attorney Southern District of New York Civil Division

c/o Social Security Administration tel: (404) 210-9532 Office of the General Counsel 6401 Security Boulevard, Baltimore, MD 21235

September 26, 2024

## Via CM/ECF

Hon. Judge Robert W. Lehrburger United States Magistrate Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312 Granted.

so ordered: 9/26/2024

HON. ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE

Re: Yesenia Luna o/b/o K.M.P.L v. Commissioner of Social Security Civil Action No. 1:24-cv-02362-JPO-RWL Letter Request for Extension of Deadlines

## Dear Judge Lehrburger:

This Office represents the Commissioner of Social Security (Commissioner), the Defendant in this matter. We write to respectfully request an extension of the remaining briefing deadlines in the above-referenced Social Security case.

Pursuant to this Court's Order dated June 24, 2024, the Commissioner's Brief is due to be filed by September 30, 2024, and Plaintiff's reply brief is due to be filed by October 21, 2024. See Dkt. No. 12. The undersigned agency counsel is experiencing a heavy caseload at this time and needs additional time to prepare the Commissioner's Brief. Thus, the undersigned requests an extension of the remaining briefing deadlines. The undersigned proposes the following modified and comprehensive schedule:

- Defendant's Brief shall be filed by October 28, 2024; and
- Plaintiff's Reply Brief shall be filed by November 18, 2024.

This is the second request for extension in this case. Plaintiff's counsel, James Baker, Esq., consents to this request.

We thank the Court for its consideration.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

BY: /s/ Avni Gandhi

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cc: James Baker, Esq. via CM/ECF